

FILED

SEP 04 2014

**RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOEL MANUEL TAYLOR

a/k/a Joel Fears,
a/k/a Joe Taylor,

Defendant.

NO. 14-CR-00117 JST

**STIPULATION AND PROPOSED ORDER TO
CONTINUE CASE AND EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT**

IT IS HEREBY STIPULATED, by and between the parties to this action, that the STATUS
HEARING date of September 5, 2014 presently scheduled at 9:30 a.m., before the Honorable Jon S.
Tigar, be vacated and re-set for November 21, 2014 at 9:30 a.m. for STATUS HEARING.

STIP. REQ. TO CONTINUE AND EXCLUDE TIME
NO. CR-14-00117 JST

1 The reason for this request is that defense counsel was only recently appointed on July 15,
 2 2014 and requested additional time to continue to investigate the matter and confer with their client.
 3 Further, defense counsel and the government are currently in active plea negotiations and the
 4 additional time would provide the newly-appointed defense counsel time to more fully consult with
 5 their client about the terms of a potential plea agreement.

6 The parties agree and stipulate to the exclusion of time under the Speedy Trial Act to allow
 7 for effective preparation of counsel and continuity of counsel. For those reasons, time is excludable
 8 pursuant to 18 U.S.C. § 3161 (h)(7)(A), and (h)(7)(B)(iv).

9 Given these circumstances, the ends of justice is served by excluding time until November 21,
 10 2014 from Speedy Trial Act calculations outweighs the interests of the public and the defendant to a
 11 speedy trial in accordance with 18 U.S.C. § 3161(h)(7)(A), and (h)(7)(B)(iv).

12
 13 DATED: September 3, 2014

Respectfully submitted,

14
 15 /s/ Caeli A. Higney
 16 CAELI A. HIGNEY

/s/ Roger Dinh
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ORDER

Based on the reasons provided in the stipulation of the parties above, with the consent of both parties, the Court orders that the above-captioned matter be continued to November 21, 2014 at 9:30 a.m., and that time be excluded from the date of this order to November 21, 2014 pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 9/4/14, 2014


HON. JON S. TIGAR
United States District Judge